

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

3M COMPANY,

Court File No.: 0:20-cv-01314 (SRN/DTS)

Plaintiff,

v.

MATTHEW STARSIK,
AMK ENERGY SERVICES LLC, and
JOHN DOES 1 THROUGH 10, whose
true names are largely unknown,

**DECLARATION OF
ROBERT W. VACCARO**

Defendants.

Pursuant to 28 U.S.C. § 1746, I, Robert W. Vaccaro, hereby declare as follows:

1. I am one of the attorneys representing Defendants Matthew Starsiak and AMK Energy Services LLC in the above-captioned matter.
2. Attached hereto as Exhibit A are true and correct copies of excerpts from the transcript of the deposition of Matthew Starsiak, taken on July 27, 2020.
3. Attached hereto as Exhibit B are true and correct copies of excerpts from the transcript of the deposition of Haley Schaffer, taken on July 31, 2020.
4. Attached hereto as Exhibit C are true and correct copies of emails between Eric Schuster and Ivan Fong dated April 27, 2020.
5. Attached hereto as Exhibit D are true and correct copies of emails between Eric Schuster and Ivan Fong dated May 10, 2020.
6. Attached hereto as Exhibit E is a true and correct copy of an email between Mica Xavier and Haley Schaffer dated May 11, 2020.

7. Attached hereto as Exhibit F is a true and correct copy of a 3M transcription of Audio File DEFS003768.

8. Attached hereto as Exhibit G is a true and correct copy of document entitled “Paymaster Instructions” and “Notice of Broker Position.”

9. Attached hereto as Exhibit H is a true and correct copy of an email from Matthew Starsiak to Eric Schuster dated May 9, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

This 10th day of August, 2020.

s/Robert W. Vaccaro
Robert W. Vaccaro